

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

KERI L. BORZILLERI,  
Plaintiff,

v.

THE STATE OF MARYLAND  
Defendant.

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) Case No.: 24-C-18-000010  
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**Declaration of Michelle K. Wilson**

I, Michelle K. Wilson, declare as follows:

1. Based on my personal experience and knowledge, I have personal knowledge of the facts set forth in this Declaration and, if called to testify, could and would testify competently to those facts under oath.

2. I am currently an Assistant Attorney General in the Office of the Maryland Attorney General, a position that I have held since December 23, 2015. As an Assistant Attorney General, I am the legal advisor for the Maryland Police and Correctional Training Commissions and handle civil litigation related to the correctional matters for the Maryland Department of Public Safety and Correctional Services.

3. Prior to working for the Maryland Attorney General, from September 21, 2005 until December 19, 2015, I was an Assistant State's Attorney in the Baltimore City State's Attorney's Office. I first met Marilyn Mosby when she was elevated to the misdemeanor unit (exact year unknown) and I was in the general felony unit.

4. On the evening of May 1, 2014, I attended an event at Westminster Hall at the University of Maryland School of Law. The purpose of event was the celebration of the 35<sup>th</sup>

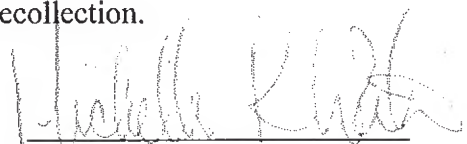
anniversary of the Alliance of Black Women Attorneys, Inc. I, along with other employees of the Baltimore City State's Attorney's Office sat at a table that then-State's Attorney Gregg Bernstein purchased. One of the other employees at the table was Syeeta Hampton-EL, who was also an Assistant State's Attorney in the office. We were seated at a round table and Ms. Hampton-EL was seated in front of me and at my table. During the evening, I saw Marilyn Mosby come in to room. She sat down at a table to my left. At that time, Marilyn Mosby was then a candidate for State's Attorney for Baltimore City.

5. I was facing the stage when I saw Ms. Hampton-EL looking at Mrs. Mosby with a shocked expression. Ms. Hampton-EL looked behind her and then looked back at Mrs. Mosby. Other attorneys seated at my table immediately reacted and said with disbelief that Mrs. Mosby made a throat slitting gesture toward Ms. Hampton-EL.

6. As the event drew to a close, Noelle Winder (now Noelle Winder Newman), who was also at the table when the incident occurred, sent a text to Mrs. Mosby to find out why Mrs. Mosby made the gesture towards Ms. Hampton-EL. After Mrs. Newman sent the text, Mrs. Newman, read the text response aloud which stating that Mrs. Mosby said Ms. Hampton-EL would be gone, which was an acknowledgment of the throat slitting gesture Ms. Mosby made to Ms. Hampton-EL at the dinner.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing are true and accurate to the best of my recollection.

April 2, 2019

  
Michelle K. Wilson